



April 1, 2024

Carolyn Upton, Forest Supervisor  
% Amanda Milburn, Lolo National Forest Plan Revision Team Leader  
Lolo National Forest Supervisor's Office  
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RE: Lolo National Forest Management Plan Revision #62960 comments

Dear Carolyn Upton,

We appreciate the opportunity to comment on the proposed revisions to the Forest Management Plan on the Lolo National Forest (LNF). The LNF's incredible wildlife, fisheries, recreation and other values are important to Sierra Club members in western Montana, and throughout the state, region and country. This forest has important qualities for the continued recovery of grizzly bears, recently federally protected wolverine, elk, deer and so many other native wildlife species. It offers tremendous recreational opportunities that our members deeply value. Sierra Club is thankful that the Forest Service is engaging the public as we work to improve management of the LNF, and we are eager to work with the agency on this important project.

Formed in 1892, Sierra Club is the nation's oldest and largest environmental advocacy organization. Our mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment and to use all lawful means to carry out these objectives.

We have a long history of working to protect wildlands and wildlife in Montana

generally, and in specifically protecting and connecting public lands between the Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) for grizzly bears and other wide-ranging species. The LNF is an essential landscape for numerous wildlife species, and it is essential in the recovery of grizzly bears as it sits directly between the identified recovery areas, offering a vital path for bears to move from the NCDE and Cabinet-Yaak Ecosystem south, into the Bitterroot Ecosystem (BE). It is also an important forest for threatened wolverine, elk, deer, black bears and numerous other wildlife species.

Sierra Club agrees that the LNF is in need of a revision to its forest plan, which was completed in 1986. Climate change and shorter, warmer, drier winters has posed serious challenges on the LNF and the state of Montana<sup>1</sup>, as wildfires have grown more intense and the fire season has lengthened. Sierra Club is supportive of efforts to restore a more natural fire regime on the forest, and allowing some wildfires to burn and fulfill their historic role in forests and meadows that evolved to burn periodically. We also support, where appropriate, prescribed fire as a management tool to help restore forest health. The revised plan should explore those issues and work toward a more natural fire regime. While we understand it has a place, mechanical treatments of forests should be focused in close proximity to homes, buildings and public infrastructure, not spread throughout the forest on a large scale.

We also see the growing impact that outdoor recreation has on the LNF. Sierra Club supports people getting out to enjoy the outdoors, and their public lands; in fact it is a central part of our mission. Our members recreate extensively on LNF lands, participating in outdoor activities like hiking, backpacking, fishing, climbing, skiing, and camping. At the same time, we recognize that motorized recreation, and new technologies including ebikes and other mechanized recreation, can put strains on wildlife security habitat. The LNF needs to take a hard look at those uses and their impacts and ensure that key wildlife security habitat is protected.

#### Alternatives in the draft Environmental Impact Statement

Sierra Club is supportive of The Lolo-Bitterroot Partnership crafted by Friends of the Bitterroot and the Flathead-Lolo-Bitterroot Citizen Task Force, and has signed onto that proposal. It should be an alternative in this revised forest plan. The Partnership proposal offers the best wildlife security, habitat conservation, wildlife corridor potential, and

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<sup>1</sup> <https://montanacclimate.org>

management of recreation to ensure the LNF is sound wildlife habitat. The proposal would benefit not only federally protected species including grizzly bears and wolverine, but also big game including elk, deer and bighorn sheep, as well as other mammal, amphibian and bird species. It would ensure quality public recreation, including wildlife watching, hiking, backpacking, skiing and fair chase hunting and fishing.

As such, Sierra Club recommends the LNF recommend all Wilderness Study Areas and Inventoried Roadless Areas for Wilderness designation by Congress. This highest-level of protection for these lands offers the greatest level of assurance that the Forest Service can meet the goals of conserving and recovering threatened and endangered species (grizzly bears, wolverine, lynx, bull trout, and whitebark pine trees).

### Grizzly Bear Recovery

Sierra Club also recommends an alternative that focuses on wildlife connectivity, particularly for grizzly bears. We have supported for decades efforts to recover grizzly bears in the Northern Rockies.

The Montana state animal is a valued public wildlife species, and efforts to recover grizzlies have seen some success in recent years. Today the Northern Continental Divide Ecosystem (NCDE) and Greater Yellowstone Ecosystem (GYE) have the only significant populations of bears, a direct result of conservation actions over the years that have included habitat protection, conflict reduction, education and much more.

A true recovery of grizzlies would include a population in the Bitterroot Ecosystem, anchored in central Idaho with the Selway-Bitterroot and Frank Church River of No Return wilderness areas. The entire ecosystem is much broader, and stretches to adjoin the LNF. Most importantly, the LNF is a vital connectivity area for grizzlies from the core populations in the NCDE and GYE. We recognize that will take time, but already a few bears have made their way into the Bitterroot Ecosystem, and they came through the LNF.

Conservation of these areas for connectivity is essential. The LNF recognizes this with the inclusion of the Ninemile Demographic Connectivity Area, encompassing more than 400 square miles. The plan states:

*“As part of the Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem, the Ninemile DCA is intended to support female grizzly occupancy and eventual dispersal to the Cabinet Yaak and Bitterroot ecosystems. The Northern Continental Divide Conservation Strategy for grizzly bears includes habitat protections within the Ninemile DCA.”*

This acknowledgement of the importance of this area is important, but Sierra Club is supportive of far broader land protections to ensure grizzlies can inhabit the LNF, and continue toward recovery throughout the Northern Rockies. We support Demographic Connectivity Areas be established for these additional areas, recognized as key areas for grizzly movement by Sells et al<sup>2</sup>, and the lands connecting these key areas.

Recent studies (Sells et al 2023; Peck et al 2017) have emphasized the importance of LNF lands for grizzly bear connectivity. The most recent study (Sells et al 2023) clearly finds that the complex of Inventoried Roadless Areas and LNF lands between them have high values for grizzly connectivity<sup>3</sup>

Closer examination of the Inventoried Roadless Area (IRA) values through use of the Sells et al (2023) data found at <https://doi.org/10.5066/P91EWUO8> shows that many LNF Inventoried Roadless Areas have high connectivity value, scoring primarily 7 to 10 in the Sells et al (2023) study. These IRAs include:

Mount Bushnell  
Cherry Peak  
Wonderful Peak  
Stevens Peak  
Gilt Edge- Silver Creek  
Ward Eagle  
Sheep Mountain-Stateline  
Hoodoo  
Stark Mountain

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<https://fwp.mt.gov/binaries/content/assets/fwp/conservation/bears/18---sells-et-al.-2023-grizzly-bear-movement-models-predict-habitat-use-for-nearby-populations.pdf>

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[https://umconnectumt-my.sharepoint.com/personal/sarah\\_sells\\_umt\\_edu/\\_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fsarah%5Fsells%5Fumt%5Fedu%2FDocuments%2FAttachments%2FSells%20et%20al%2E%202023%2E%20Predicted%20connectivity%20pathways%20between%20grizzly%20bear%20eco%20systems%20in%20Western%20Montana%2Epdf&parent=%2Fpersonal%2Fsarah%5Fsells%5Fumt%5Fedu%2FDocuments%2FAttachments&ga=1](https://umconnectumt-my.sharepoint.com/personal/sarah_sells_umt_edu/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fsarah%5Fsells%5Fumt%5Fedu%2FDocuments%2FAttachments%2FSells%20et%20al%2E%202023%2E%20Predicted%20connectivity%20pathways%20between%20grizzly%20bear%20eco%20systems%20in%20Western%20Montana%2Epdf&parent=%2Fpersonal%2Fsarah%5Fsells%5Fumt%5Fedu%2FDocuments%2FAttachments&ga=1)

Meadow Creek  
Patricks Knob-North Cutoff  
Reservation Divide  
South Seigel- South Cutoff  
North Siegel  
Petty Mountain  
Burdette  
Garden Point  
Lolo Creek  
McGregor-Thompson  
Deep Creek

An example of Mt Bushnell and Cherry Peak is shown below:

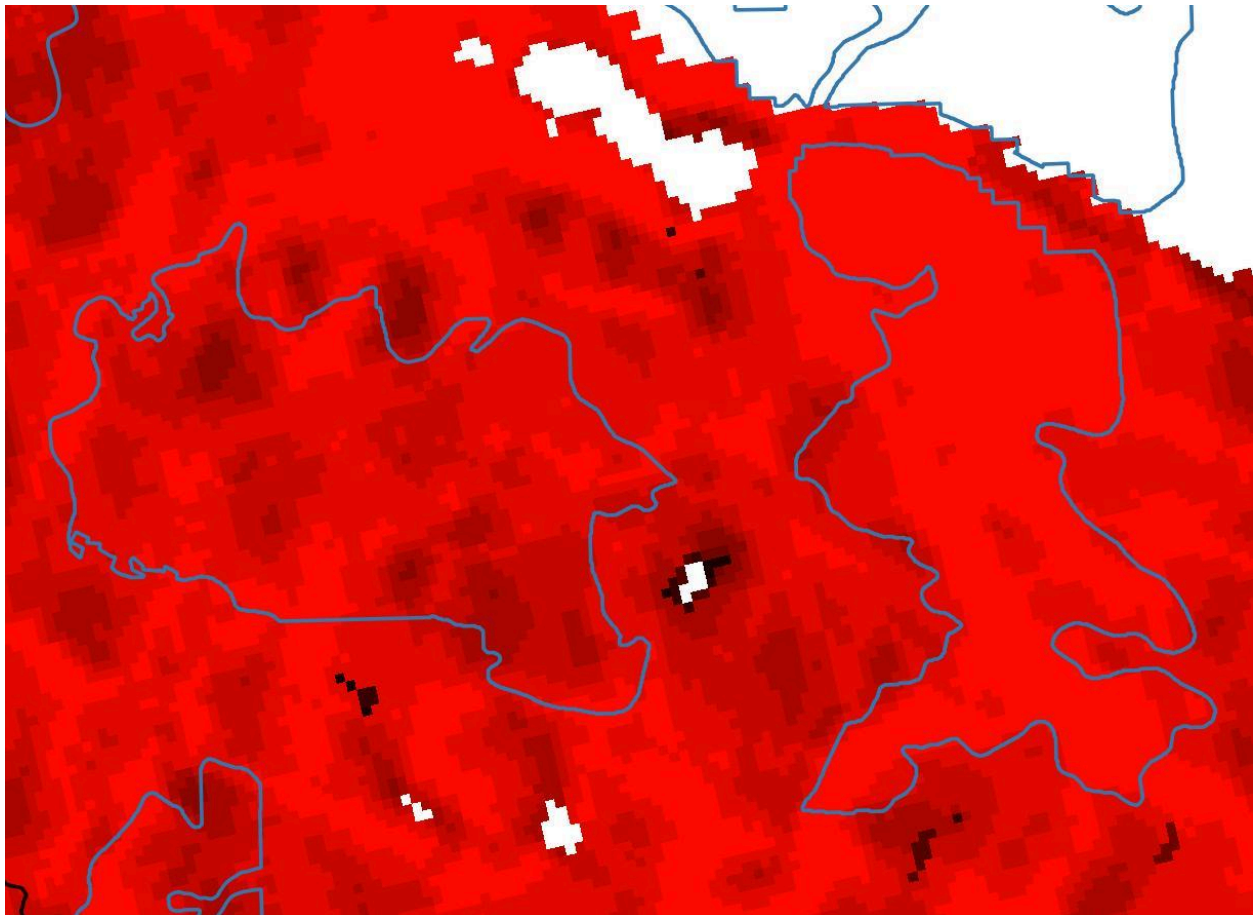


Figure x. Mt Bushnell and Cherry Peak IRAs Female Directed Connectivity Values. Data is from Sells et al (2023). Mt. Bushnell is on the left and Cherry Peak on the right outlined in blue. The brighter the red the higher the connectivity value. For example, most of Cherry Peak is the

highest value (10) with pixels of 9 score and some 8 score along the edges. Lowest value in Mt Bushell is a score of 6.

There are no standards or guidelines for MA3, or other lands that serve as high value grizzly connectivity areas according to the best available science, that explicitly preserve or enhance connectivity values of these areas as required by the 2012 USFS Forest Planning Rules. The 2012 National Forest Planning Regulations contain specific planning obligations for the National Forest units to fulfill.

In particular, the new regulations have substituted two provisions §219.8 and §219.9 for the 1982 regulations' "maintain viable populations of forest vertebrates" standard. These new sections seek to meet the mandate of the National Forest Management Act that forest plans "provide for the diversity of plant and animal communities..." 16 USC §1604(g)(3)(B). In relevant part §219.8, it states:

- (a) *Ecological Sustainability*. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure function, composition, and connectivity, taking into account:
- (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area.
- (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.

In parallel language §219.9 Diversity of plant and animal communities, in relevant part, states:

- (a) Ecosystem plan components. (1) *Ecosystem Integrity*. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity.

These rules mandate standards or guidelines to preserve connectivity. None are present in MA 3 and the forestwide direction lacks such standards or guidelines as well. This is particularly true for Endangered Species Act listed species such as lynx, grizzly bear and wolverine, all of which require specific management to protect and preserve connectivity

as well as core habitat. MA 3 areas are key for preserving a permeable landscape that will allow grizzly, wolverine and lynx to survive and ultimately thrive. There is no apparent plan for connectivity in the proposed action based on the lack of standards and guidelines to preserve movement of wildlife across the landscape, particularly by grizzly bears.

We request analysis of an alternative incorporating specific grizzly connectivity standards and guidelines within the above IRAs and surrounding high value connectivity lands on the LNF. Those standards and guidelines should extend beyond the no new permanent roads and timber harvest limits suitability criteria in the proposed action (indeed, it is unclear if the suitability directives have the same enforceability as a standard or guideline) found in MA3 SUIT 01 and 02 (Proposed Action page 157). There should be included:

1. Road density limits of  $<1.0$  km/km<sup>2</sup> outside of IRAs.
2. Motorized recreation limits and no new motorized trails within and outside of IRAs.
3. Food storage orders and other conflict reduction measures.
4. No reentry for 10 years for management other than active fire suppression.
5. No temporary roads inside of MA3 lands.

The LNF provides vital connectivity for grizzlies between the Cabinet-Yaak and Northern Continental Divide Ecosystems and the Bitterroot Ecosystem. With the active planning for grizzlies in the Bitterroot by the U.S. Fish and Wildlife Service, it is especially necessary to plan to protect these values and conserve and enhance connectivity on the LNF.

### Other Threatened and Endangered Species

The connectivity alternative should also consider movement and denning habitat needs of wolverine (*Gulo gulo*). Wolverine are sensitive to winter recreation in denning habitat and management should control recreation in those areas to avoid displacement of denning females with kits.

Lynx, which are also endangered, again require secure habitat and a lack of human disturbance to facilitate their conservation as we work to recover the species. Again, the plan revision should work to conserve as many key areas as possible, many of which correspond with the protections for grizzly bears.

Finally, bull trout conservation and restoration in streams and rivers on the forest requires habitat protection to keep these waters clean and cold. The plan revision needs to consider bull trout in ensuring that watersheds have protections to help with recovery.

## Wilderness Designations

Sierra Club has long advocated for protection of appropriate National Forest lands for inclusion in the national Wilderness Preservation System. As only Congress can designate wilderness areas, it is important for the Forest Service to continue to manage appropriate lands for their wilderness characteristics. Sierra Club supports designation not only of all Wilderness Study Areas as Wilderness, but also all the Inventoried Roadless Areas, as recommended in the citizen's proposal.

In addition, Sierra Club is strongly opposed to efforts to designate specific trails, corridors or other special uses that are not in line with the Wilderness Act into Wilderness Study Areas and Inventoried Roadless Areas. These efforts are often driven by mountain biking interests, and are not in line with the intent and spirit of the Wilderness Act to conserve lands with a strong emphasis on wildlife habitat and the lands natural state, with humans as a visitor and only through non-mechanized travel. Mountain bikes do displace wildlife, and cause elk and other species to change how they use the landscape<sup>4</sup>. The advocacy by certain mountain biking interests fails to mention that more than 1.2 million acres of the LNF are general forest lands, and open to mountain biking on a variety of roads and trails.

## Old Growth Forest Protection

Sierra Club supports the preservation and conservation of old growth forests. We support efforts on the LNF to identify old growth forests and preserve those areas for their immense values and ecological benefits. These include carbon storage, increased biodiversity, watershed health, and other economic and social values of these areas. Guidance from the Environmental Impact Statement being drafted as a result of the December, 2023 Executive Order #14072 on old growth forest management should be helpful in achieving these goals, as the US Forest Service works to fulfill the Executive Order's directive, and increase distribution and abundance of old-growth forests across the National Forest System.

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<sup>4</sup> Behavioral Responses of North American Elk to Recreational Activity, Naylor et al., The Journal of Wildlife Management, April 2009



## Wolf Conservation and Recovery

Gray wolves are not listed as an endangered or threatened species under the Endangered Species Act in Montana or Idaho, despite aggressive wolf killing practices implemented by both states to drive numbers down to bare minimum numbers. However, wolves remain protected in 44 states, and the populations in the Northern Rockies are important to provide secure habitat for our wolves, and to allow them to move into other regions as dispersers to continue wolf recovery. The Citizen's Proposal to conserve WSAs and IRAs as designated Wilderness offers the best chance to conserve key wolf habitat, and aid in the effort to continue a large-scale restoration of wolves throughout the Northern Rockies and Northwest.

## Other Considerations

Sierra Club is supportive of conserving key wildlife habitat for its wildland value and value for wildlife-related recreation. At the same time, we understand that with more development in western Montana, we need to address the larger, more frequent and more intense wildfires that climate change and decades of fire suppression have brought to our forests. We are supportive of prescribed fire, where appropriate, to help return more frequent, less intense fires to the landscape. Such projects should be planned with the intent to restore a more natural fire regime to the forest, especially by letting more wildfires burn so they can play their role in the ecosystem.

We are not supportive of misguided efforts to “fireproof” the forest through intensive logging that infringes on secure habitat for grizzly bears, wolves, and big game including elk and mule deer. Any prescribed burn project should be planned through an Environmental Impact Statement that takes into account the disturbance to wildlife security habitat. Prescribed burning and work to restore a more natural fire regime should be considered in an alternative in the plan.

Again, thank you for the opportunity to comment on this proposal to revise the LNF Forest Plan. Sierra Club values our working relationship with the Forest Service to conserve and protect our public lands, promote abundant wildlife and fisheries, and ensure healthy lands for all Americans to enjoy. We are confident that with careful planning and implementation, we can improve conditions on the LNF, continue the recovery of threatened and endangered species, and continue to build our public wildlife

heritage that so many Americans cherish. We look forward to working with you as this process moves forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nick Gevock". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nick Gevock

Field Organizing Strategist, Northern Rockies Wildlands and Wildlife